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# WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 01-137

### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

#### **2. Form, Style and Placement in Administrative Code**

a. Although useful for emphasis, use of italics in s. TCS 10.08 (2m) is not appropriate drafting style. The agency may wish to review the intended meaning of “simultaneously”; if it is intended to cover drop/adds done at the same time or in the same transaction, that could be clarified. Also, in the first sentence, it appears that the word “be” should be inserted before the word “charged.”

b. Use of the term “aforementioned” in s. TCS 16.07 (4) should be avoided. [See s. 1.01 (9) (b), Manual.] Replacing the term with “under this subsection” would appear appropriate.

c. In s. TCS 16.02 (9), the phrase “certificate as defined in s. TCS 16.02 (9m)” is unnecessary and should be deleted.

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. The last sentence of s. TCS 16.07 (4) is unclear. Is it intended to deny eligibility for future grants for errors that are *not* attributable to the student?

b. The agency may wish to include an “initial applicability” section to clarify the grants and refunds that will be affected.